

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application Pursuant to 28 U.S.C. § 1782 of
OKEAN B.V. and LOGISTIC SOLUTION
INTERNATIONAL LIMITED,

Petitioners,

– to take discovery of –

CHADBOURNE & PARKE LLP,

Respondent.

Misc. No. 12-00104 (Part 1)
(Engelmayer, J.)

**DECLARATION OF
ANDREW A. GIACCIA
IN OPPOSITION
TO PETITIONERS'
MOTION TO COMPEL**

ANDREW A. GIACCIA hereby declares and states pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Chadbourne & Parke LLP ("Chadbourne"), respondent *pro se* in this proceeding. I make this declaration, based upon my own personal knowledge, in opposition to Petitioners' motion to compel.

2. Since November 2010, I have been the Managing Partner of Chadbourne and a member of its five-person Management Committee. I am based in Chadbourne's offices located at 30 Rockefeller Plaza, New York, New York, and its offices located at 1200 New Hampshire Avenue, N.W., Washington, District of Columbia. I am admitted to the District of Columbia bar.

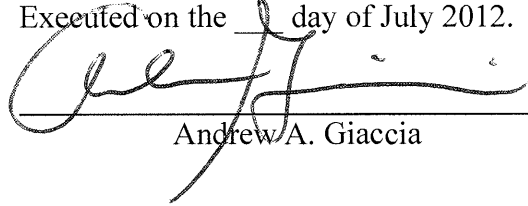
3. I have reviewed the Declaration of Tom Einertsen in Support of Petitioners' Motion to Compel, dated July 6, 2012. Contrary to the erroneous statements in that declaration, to my knowledge I have never acted or agreed to act as an "authorized representative" of Olympus Investments (2001) B.V. ("Olympus") or any of its bank accounts, nor have I performed any "work" or other services for Olympus in any capacity. To my knowledge, I do

not have and never did have signing or other authority with respect to any Olympus bank accounts.

4. Moreover, to my knowledge I have never provided any legal, business, or other advice or services to Olympus. To my knowledge I have never met or had any communications with anyone from Olympus. It is my understanding that any legal advice that may have been provided by Chadbourne concerning Olympus was provided by Chadbourne attorneys based outside of the United States, and not by me or any other Chadbourne attorney based in the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the ^{20th} day of July 2012.



Andrew A. Giaccia